

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Annette White Dixon
Gerald Edward Dixon, Debtors**

**Case No. 25-50738-KMS
CHAPTER 13**

**NOTICE OF FILING CHAPTER 13 PLAN AND MOTIONS FOR VALUATION AND
LIEN AVOIDANCE**

The above-named Debtors have filed a *Chapter 13 plan and Motions for Valuation and Lien Avoidance* (the “Plan”) with the Bankruptcy Court in the above referenced case (see attachment).

Any objection to confirmation of the Plan or the motions contained therein shall be filed in writing with the Clerk of Court at Dan M. Russell, Jr. U.S. Courthouse 2012 15th Street, Suite 244 Gulfport, MS 39501 on or before July 9, 2025. Copies of the objection must be served on the Trustee, US Trustee, Debtors, and Attorney for Debtors.

Objections to confirmation will be heard and confirmation determined on August 19, 2025 at 01:30 PM in the William Colmer Federal Building, 701 N. Main Street, Hattiesburg, MS 39401, unless the court orders otherwise. If no objection is timely filed, the Plan may be confirmed without a hearing.

Date: May 22, 2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

Fill in this information to identify your case:

Debtor 1	Annette White Dixon Full Name (First, Middle, Last)
Debtor 2	Gerald Edward Dixon (Spouse, if filing) Full Name (First, Middle, Last)
United States Bankruptcy Court for the	SOUTHERN DISTRICT OF MISSISSIPPI
Case number: (If known)	

Check if this is an amended plan, and list below the sections of the plan that have been changed.

Chapter 13 Plan and Motions for Valuation and Lien Avoidance

12/17

Part 1: Notices

To Debtors: This form sets out options that may be appropriate in some cases, but the presence of an option on the form does not indicate that the option is appropriate in your circumstances or that it is permissible in your judicial district. Plans that do not comply with local rules and judicial rulings may not be confirmable. The treatment of ALL secured and priority debts must be provided for in this plan.

In the following notice to creditors, you must check each box that applies

To Creditors: Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated.

You should read this plan carefully and discuss it with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you oppose the plan's treatment of your claim or any provision of this plan, you or your attorney must file an objection to confirmation on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I). The Bankruptcy Court may confirm this plan without further notice if no objection to confirmation is filed. See Bankruptcy Rule 3015.

The plan does not allow claims. Creditors must file a proof of claim to be paid under any plan that may be confirmed.

The following matters may be of particular importance. Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked, the provision will be ineffective if set out later in the plan.

1.1	A limit on the amount of a secured claim, set out in Section 3.2, which may result in a partial payment or no payment at all to the secured creditor	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included
1.2	Avoidance of a judicial lien or nonpossessory, nonpurchase-money security interest, set out in Section 3.4.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included
1.3	Nonstandard provisions, set out in Part 8.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included

Part 2: Plan Payments and Length of Plan

2.1 Length of Plan.

The plan period shall be for a period of 60 months, not to be less than 36 months or less than 60 months for above median income debtor(s). If fewer than 60 months of payments are specified, additional monthly payments will be made to the extent necessary to make the payments to creditors specified in this plan.

2.2 Debtor(s) will make payments to the trustee as follows:

Debtor shall pay \$1,427.18 (monthly, semi-monthly, weekly, or bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the debtor's employer at the following address:

Direct.

Debtor

Annette White Dixon
Gerald Edward Dixon

Case number

Joint Debtor shall pay monthly, semi-monthly, weekly, or bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the joint debtor's employer at the following address:

2.3 Income tax returns/refunds.*Check all that apply*

Debtor(s) will retain any exempt income tax refunds received during the plan term.

Debtor(s) will supply the trustee with a copy of each income tax return filed during the plan term within 14 days of filing the return and will turn over to the trustee all non-exempt income tax refunds received during the plan term.

Debtor(s) will treat income refunds as follows:

2.4 Additional payments.*Check one.*

None. If "None" is checked, the rest of § 2.4 need not be completed or reproduced.

Part 3: Treatment of Secured Claims**3.1 Mortgages. (Except mortgages to be crammed down under 11 U.S.C. § 1322(c)(2) and identified in § 3.2 herein.).***Check all that apply.*

None. If "None" is checked, the rest of § 3.1 need not be completed or reproduced.

3.1(a) Principal Residence Mortgages: All long term secured debt which is to be maintained and cured under the plan pursuant to 11 U.S.C. § 1322(b)(5) shall be scheduled below. Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor, subject to the start date for the continuing monthly mortgage payment proposed herein.

-NONE- Mtg pmts to

Beginning _____ @ _____ Plan Direct. Includes escrow Yes No

-NONE- Mtg arrears to _____ Through _____

3.1(b) □ Non-Principal Residence Mortgages: All long term secured debt which is to be maintained and cured under the plan pursuant to 11 U.S.C. § 1322(b)(5) shall be scheduled below. Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor, subject to the start date for the continuing monthly mortgage payment proposed herein.

Property **-NONE-**

address: _____

Mtg pmts to _____

Beginning _____ month @ _____ Plan Direct. Includes escrow Yes No

Property **-NONE-** Mtg arrears to _____ Through _____

3.1(c) Mortgage claims to be paid in full over the plan term: Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor.

Creditor: **Vanderbilt Mortgage** Approx. amt. due: **\$17,729.00** Int. **10.00%**Rate*: _____
Property Address: **225 Southgate Rd Hattiesburg, MS 39401 Forrest County**
mobile home onlyPrincipal Balance to be paid with interest at the rate above: **\$17,729.00**

(as stated in Part 2 of the Mortgage Proof of Claim Attachment)

Portion of claim to be paid without interest: \$ **0.00**

(Equal to Total Debt less Principal Balance)

Debtor

Annette White Dixon
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Special claim for taxes/insurance: \$ 106.19 /month, beginning June 2025
 (as stated in Part 4 of the Mortgage Proof of Claim Attachment)

* Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District
Insert additional claims as needed.

3.2 Motion for valuation of security, payment of fully secured claims, and modification of undersecured claims. Check one..

None. If "None" is checked, the rest of § 3.2 need not be completed or reproduced.
The remainder of this paragraph will be effective only if the applicable box in Part 1 of this plan is checked.

Pursuant to Bankruptcy Rule 3012, for purposes of 11 U.S.C. § 506(a) and § 1325(a)(5) and for purposes of determination of the amounts to be distributed to holders of secured claims, debtor(s) hereby move(s) the court to value the collateral described below at the lesser of any value set forth below or any value set forth in the proof of claim. Any objection to valuation shall be filed on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I).

The portion of any allowed claim that exceeds the amount of the secured claim will be treated as an unsecured claim under Part 5 of this plan. If the amount of a creditor's secured claim is listed below as having no value, the creditor's allowed claim will be treated in its entirety as an unsecured claim under Part 5 of this plan. Unless otherwise ordered by the court, the amount of the creditor's total claim listed on the proof of claim controls over any contrary amounts listed in this paragraph.

Name of creditor	Estimated amount of creditor's total claim #	Collateral	Value of collateral	Amount of secured claim	Interest rate*
Hattiesburg Finance	\$3,800.00	2024 Mississippi AG mower, utility trailer, pressure washer	\$2,500.00	\$2,500.00	10.00%

Insert additional claims as needed.

#For mobile homes and real estate identified in § 3.2: Special Claim for taxes/insurance:

Name of creditor	Collateral	Amount per month	Beginning month
-NONE-			

* Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District

For vehicles identified in § 3.2: The current mileage is _____

3.3 Secured claims excluded from 11 U.S.C. § 506.

Check one.

None. If "None" is checked, the rest of § 3.3 need not be completed or reproduced.
 The claims listed below were either:

- (1) incurred within 910 days before the petition date and secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or
- (2) incurred within 1 year of the petition date and secured by a purchase money security interest in any other thing of value.

These claims will be paid in full under the plan with interest at the rate stated below. Unless otherwise ordered by the court, the claim amount stated on a proof of claim filed before the filing deadline under Bankruptcy Rule 3002(c) controls over any contrary amount listed below. In the absence of a contrary timely filed proof of claim, the amounts stated below are controlling.

Name of Creditor	Collateral	Amount of claim	Interest rate*
Exeter Finance LLC	2018 Chevrolet Silverado 135000 miles	\$20,654.00	10.00%
Santander Consumer USA	2020 Nissan Rogue 42000 miles	\$13,426.00	10.00%

*Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District.

Debtor

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*Insert additional claims as needed.***3.4 Motion to avoid lien pursuant to 11 U.S.C. § 522.***Check one.* **None.** If "None" is checked, the rest of § 3.4 need not be completed or reproduced.**3.5 Surrender of collateral.***Check one.* **None.** If "None" is checked, the rest of § 3.5 need not be completed or reproduced.**Part 4: Treatment of Fees and Priority Claims****4.1 General**

Trustee's fees and all allowed priority claims, including domestic support obligations other than those treated in § 4.5, will be paid in full without postpetition interest.

4.2 Trustee's fees

Trustee's fees are governed by statute and may change during the course of the case.

4.3 Attorney's fees. No look fee: 4,600.00Total attorney fee charged: \$4,600.00Attorney fee previously paid: \$227.00Attorney fee to be paid in plan per confirmation order: \$4,373.00 Hourly fee: \$_____. (Subject to approval of Fee Application.)**4.4 Priority claims other than attorney's fees and those treated in § 4.5.***Check one.* **None.** If "None" is checked, the rest of § 4.4 need not be completed or reproduced. Internal Revenue Service \$922.00 Mississippi Dept. of Revenue \$0.00 Other \$0.00**4.5 Domestic support obligations.** **None.** If "None" is checked, the rest of § 4.5 need not be completed or reproduced.**Part 5: Treatment of Nonpriority Unsecured Claims****5.1 Nonpriority unsecured claims not separately classified.**Allowed nonpriority unsecured claims that are not separately classified will be paid, pro rata. If more than one option is checked, the option providing the largest payment will be effective. *Check all that apply.* The sum of \$ 0.00 % of the total amount of these claims, an estimated payment of \$ 0.00 The funds remaining after disbursements have been made to all other creditors provided for in this plan.If the estate of the debtor(s) were liquidated under chapter 7, nonpriority unsecured claims would be paid approximately \$0.00

Debtor

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Case number

Regardless of the options checked above, payments on allowed nonpriority unsecured claims will be made in at least this amount.

5.2 Other separately classified nonpriority unsecured claims (special claimants). Check one. **None.** If "None" is checked, the rest of § 5.3 need not be completed or reproduced.**Part 6: Executory Contracts and Unexpired Leases****6.1 The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory contracts and unexpired leases are rejected. Check one.** **None.** If "None" is checked, the rest of § 6.1 need not be completed or reproduced.**Part 7: Vesting of Property of the Estate****7.1 Property of the estate will vest in the debtor(s) upon entry of discharge.****Part 8: Nonstandard Plan Provisions****8.1 Check "None" or List Nonstandard Plan Provisions** **None.** If "None" is checked, the rest of Part 8 need not be completed or reproduced.**Part 9: Signatures:****9.1 Signatures of Debtor(s) and Debtor(s)' Attorney***The Debtor(s) and attorney for the Debtor(s), if any, must sign below. If the Debtor(s) do not have an attorney, the Debtor(s) must provide their complete address and telephone number.*X /s/ Annette White Dixon**Annette White Dixon**

Signature of Debtor 1

Executed on May 20, 2025**225 Southgate Rd**

Address

Hattiesburg MS 39401-0000

City, State, and Zip Code

Telephone Number

X /s/ Gerald Edward Dixon**Gerald Edward Dixon**

Signature of Debtor 2

Executed on May 20, 2025**225 Southgate Rd**

Address

Hattiesburg MS 39401-0000

City, State, and Zip Code

Telephone Number

X /s/ Thomas C. Rollins, Jr.**Thomas C. Rollins, Jr. 103469**

Signature of Attorney for Debtor(s)

P.O. Box 13767**Jackson, MS 39236**

Address, City, State, and Zip Code

601-500-5533

Telephone Number

trollins@therollinsfirm.com

Email Address

Date May 20, 2025**103469 MS**

MS Bar Number

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., attorney for the Debtors, do hereby certify that by filing the attached Notice and Chapter 13 Plan, I have caused the following party to be served electronically via ECF:

Case Trustee
Office of the US Trustee

I certify that I have this day served a true and correct copy of the attached Notice and Chapter 13 Plan by US Mail¹, postage prepaid, to the following creditor(s) listed in Sections 3.2 and/or 3.4 of the Plan pursuant to Fed. R. Bankr. P. 7004:

Hattiesburg Finance Co.
c/o Earl C. Sanderson
#60 Sis Hobson Rd
Hattiesburg, MS 39401

I further certify that I have this day served a true and correct copy of the Notice and Chapter 13 Plan by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix).

Date: May 22, 2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr., Attorney for Debtor

Thomas C. Rollins, Jr., MSB# 103469
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
trollins@therollinsfirm.com
601-500-5533

¹ If the creditor is an insured depository institution, service has been made by certified mail.

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3 **UNITED STATES BANKRUPTCY COURT**
4 **SOUTHERN DISTRICT OF MISSISSIPPI**
56 IN RE:
7
8 ANNETTE WHITE DIXON
9 GERALD EDWARD DIXON
1011 CASE NO: 25-50738-KMS
12 **CERTIFICATE OF SERVICE**
13 **DECLARATION OF MAILING**
14 Chapter: 13
1516 On 5/22/2025, a copy of the following documents, described below,
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18 Notice and Plan
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21
22
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were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

22 DATED: 5/22/2025
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27
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Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
ANNETTE WHITE DIXON
GERALD EDWARD DIXON

CASE NO: 25-50738-KMS
**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 5/22/2025, I did cause a copy of the following documents, described below,

Notice and Plan

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a [certIFICATEofservice.com](#), an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/22/2025

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.
Attorney at Law
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401
601 500 5533
trollins@therollinsfirm.com

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 25-50738-KMS
 SOUTHERN DISTRICT OF MISSISSIPPI
 THU MAY 22 9-7-29 PST 2025

EXCLUDE

US BANKRUPTCY COURT
 DAN M RUSSELL JR US COURTHOUSE
 2012 15TH STREET SUITE 244
 GULFPORT MS 39501-2036

EXETER FINANCE LLC
 ATTN BANKRUPTCY
 PO BOX 166008
 IRVING TX 75016-6008

HATTIESBURG CLINIC
 PO BOX 3488
 TUPELO MS 38803-3488

HATTIESBURG FINANCE
 1910 HARDY ST
 STE 30
 HATTIESBURG MS 39401-4917

INTERNAL REVENUE SERVI
 CENTRALIZED INSOLVENCY
 PO BOX 7346
 PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVI
 CO US ATTORNEY
 501 EAST COURT ST
 STE 4430
 JACKSON MS 39201-5025

REGIONAL MANAGEMENT CORPORATION
 979 BATESVILLE ROAD STE B
 GREER SC 29651-6819

REGIONAL FINANCE
 979 BATESVILLE RD
 GREER SC 29651-6819

SANTANDER CONSUMER USA
 ATTN BANKRUPTCY
 PO BOX 961245
 FORT WORTH TX 76161-0244

US ATTORNEY GENERAL
 US DEPT OF JUSTICE
 950 PENNSYLVANIA AVENW
 WASHINGTON DC 20530-0001

UNITED STATES TRUSTEE
 501 EAST COURT STREET
 SUITE 6-430
 JACKSON MS 39201-5022

VANDERBILT MORTGAGE
 ATTN BANKRUPTCY
 PO BOX 9800
 MARYVILLE TN 37802-9800

DEBTOR
 ANNETTE WHITE DIXON
 225 SOUTHGATE RD
 HATTIESBURG MS 39401-9074

EXCLUDE
 (P) DAVID RAWLINGS
 ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE
 PO BOX 566
 HATTIESBURG MS 39403-0566

GERALD EDWARD DIXON
 225 SOUTHGATE RD
 HATTIESBURG MS 39401-9074

EXCLUDE
 THOMAS CARL ROLLINS JR
 THE ROLLINS LAW FIRM PLLC
 PO BOX 13767
 JACKSON MS 39236-3767

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4 UNITED STATES BANKRUPTCY COURT
5 SOUTHERN DISTRICT OF MISSISSIPPI
6
78 IN RE:
9 Annette White Dixon
10 Gerald Edward Dixon
1112 CASE NO: 25-50738-KMS
13 **DECLARATION OF MAILING**
14 **CERTIFICATE OF SERVICE**
15 Chapter: 13
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1819 Notice and Plan
2021 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
22 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
23 incorporated as if fully set forth herein.
2425 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
26 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
27 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
28 fully set forth herein.
2930 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
31 served electronically with the documents described herein per the ECF/PACER system.
3233 DATED: 5/22/2025
3435 /s/ Thomas C. Rollins, Jr.
36 Thomas C. Rollins, Jr.
37 Attorney at Law
38 The Rollins Law Firm
39 702 W. Pine Street
40 Hattiesburg, MS 39401
41 601 500 5533
42 trollins@therollinsfirm.com
43

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3 **UNITED STATES BANKRUPTCY COURT**
4 **SOUTHERN DISTRICT OF MISSISSIPPI**
56 **IN RE:**7 Annette White Dixon
8 Gerald Edward Dixon
910 CASE NO: 25-50738-KMS
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22 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth
23 herein.
2425 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
26 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of
27 Service and that it is true and correct to the best of my knowledge, information, and belief.
2829 DATED: 5/22/2025
3031 
3233 Miles Wood
34 BK Attorney Services, LLC
35 d/b/a certificateofservice.com, for
36 Thomas C. Rollins, Jr.
37 The Rollins Law Firm
38 702 W. Pine Street
39 Hattiesburg, MS 39401
40

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

HATTIESBURG FINANCE CO.
C/O EARL C. SANDERSON
#60 SIS HOBSON RD
HATTIESBURG MS 39401